

AFFIDAVIT

I, Joseph R. McCullough, being first duly sworn, do depose and state that:

1. I am a federally deputized Task Force Officer (TFO) of the Bureau of Alcohol, Tobacco, Firearms & Explosives, assigned to the Kansas City, Missouri Office. As such, I am an “investigative or law enforcement officer” of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516(1). I have been a Task Force Officer (TFO) of the ATF since May 2011. I also work as a Detective/Police Officer with the Sedalia, Missouri Police Department (SPD), and have been with the SPD since January 2006. During my career as a law enforcement officer, I have participated in numerous drug investigations, either as a case agent or in various support roles at both the state and federal level. I have received specialized training on the subject of firearms, narcotics trafficking, and money laundering from the ATF and other law enforcement entities, and have been personally involved in investigations concerning firearms and the possession, manufacture, distribution and importation of controlled substances, as well as methods used to finance drug transactions.

2. This affidavit is in support of search warrants for data attributable to a Facebook account on one profile: SEDVILLE JACK, Facebook ID number 100006833160130; SEDALIA, MISSOURI; from January 20, 2015, through July 11, 2017, including, but not limited to: basic subscriber information, expanded subscriber content, all deleted content, uploaded or linked photographs and videos associated data, friend list, group information, private messages, IP addresses that accessed this account, IP addresses that visited the account, all wall comments, tags or similar items or other digital evidence, geographic locators, including a business record affidavit.

3. The facts in this affidavit come from my personal observations, training and experience, and information obtained from other agents, officers and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant, and does not set forth all of my knowledge about this matter. The following is a summary of the investigation:

4. On January 16, 2015, Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) Special Agent (SA) Timothy Canon and I conducted an interview with a confidential informant (CI) concerning narcotics distribution in and around Sedalia, Missouri. The CI identified Teresa Wolfe as a major distributor of methamphetamine and prescription pills operating in and around Sedalia, Missouri. The CI advised that Wolfe resides at 1814 E. 6th Street, Sedalia, Missouri, drives a black Ford Ranger pickup and utilizes cell phone number (660) 281-6527. The CI advised Wolfe normally obtains 2 to 4 ounces of methamphetamine and approximately 100 prescription pills per week from various sources. The CI advised that Wolfe distributes narcotics from her residence and will deliver to her customers. The CI advised that on a recent trip to Wolfe’s residence, he/she observed a plastic zip-lock type bag containing in excess of ½ pound of methamphetamine. The CI advised that Wolfe obtains methamphetamine from Jackie Shelledy

(SEDEVILLE JACK) who is a member of the Galloping Goose MC and resides in Sedalia, Missouri.

5. From January 2015 through February 2016, ATF purchased 953 grams of methamphetamines from Wolfe utilizing ATF undercover SA Chris Redies. On March 1, 2016, ATF agents and other law enforcement officers were conducting surveillance of Wolfe in Raytown, Missouri. Wolfe was observed leaving the residence of a known source of supply, Clarence Bradley. Wolfe drove to the Quality Inn located at 4200 S. Noland Road in Independence, Missouri. Wolfe was observed getting bags from her car and entering the hotel. A “knock and talk” investigation was conducted at the hotel. SA Wayland contacted Wolfe outside of room 229 and detained her on a municipal warrant. Wolfe granted permission to search the hotel room and her car. Syringes and residue were the only items of evidence found. SA Wayland confronted Wolfe about an ongoing narcotics investigation involving her. Wolfe later produced several plastic baggies from her bra area and threw them onto the floor of the hotel room. There were five baggies, all of which appeared to contain methamphetamine and added up to approximately 71.2 grams of methamphetamine measured at 91% pure. Wolfe also had \$4,993 on her person.

6. Wolfe was taken to IPD headquarters and after waving her *Miranda* rights was interviewed by TFO McCullough. Wolfe said that for the past six months she had been selling methamphetamine. Her primary source of supply was Bradley. Wolfe started by purchasing an “8 ball” of methamphetamine, but that quickly increased to a quarter pound and then a half a pound once a week, or every three to four days. Wolfe also provided information about Jackie Shelledy. Wolfe stated that after having a falling out with Bradley approximately one month prior to the interview, Wolfe started getting her methamphetamine from Shelledy. Wolfe said she had previously supplied Shelledy quarter pounds of methamphetamine. Wolfe said that she had received between a quarter pound and a half of a pound of methamphetamine from Shelledy over the last month or two. Shelledy would typically deliver the methamphetamine to her. Wolfe said that Shelledy was a member of the Galloping Goose Motorcycle Club in Springfield, and she believed that she would be killed for telling TFO McCullough about Shelledy.

7. After Wolfe’s arrest on March 1, 2016, she agreed to work as a CI for the ATF. On March 2, 2016, Wolfe called Jackie Shelledy’s home to try to purchase from Shelledy. Shelledy’s wife, Lisa, answered the phone. When Wolfe asked if Shelledy had any “stuff,” Lisa said that they did not have anything and that Shelledy could not “hook her up.” Later on the same day, Wolfe called Shelledy and spoke to him about obtaining methamphetamine. Shelledy asked if Wolfe was talking about “medicine,” referencing morphine, and Wolfe responded that she was talking about the “other stuff,” referencing methamphetamine. Shelledy said that he could get some, but that it would be after “church” at 7 p.m. Church is a reference to a motorcycle club meeting. Shelledy said he would contact her later, but never did.

8. On January 31, 2017, SA Redies conducted a second proffer interview of Bradley. Bradley said that he met Shelledy in the summer of 2015 through Wolfe while in Tightwad. Bradley said that he sold Shelledy a pound of methamphetamine for \$9,000 on two separate occasions in Raytown in the fall of 2015. Bradley also recalled an instance where he sold Wolfe

two pounds of methamphetamine, and Shelledy then bought approximately one pound of methamphetamine from Wolfe.

9. On June 27, 2017, an arrest warrant was issued for Teresa A. Wolfe out of the Western District of Missouri. The arrest warrant was for Conspiracy to Distribute Methamphetamine, Distribution of Methamphetamine, and Possession with the Intent to Distribute/Distribution of Methamphetamine. On July 11, 2017, TFO Matt Sprinkles, Det. Kevin Klein, and I established surveillance around 630 E. 11th Street in Sedalia, Missouri. The address is the known residence of Wolfe. At approximately 3:00 p.m., I observed a teal colored Chrysler 300 pull into the alley behind the residence, which was known to be Wolfe's vehicle. I then pulled in behind the car and ordered Wolfe to put her hands out the window, which she did. I then approached and had Wolfe exit the vehicle. She was then placed under arrest. After the arrest, I interviewed Wolfe who told me about Jackie Shelledy. Wolfe stated that Shelledy had come to see her that day. Wolfe stated that Shelledy wanted to know what happened on her previous arrest. Shelledy wanted to know if she tried to set him up. Wolfe stated that Shelledy just wanted to hear her side of the story. I asked Wolfe if she had Shelledy's new telephone number. She stated that she did not. She stated that she had contact with him through Facebook messenger on her phone. Wolfe then provided her cell phone to me to view the messages from Shelledy. I observed numerous messages where Shelledy was trying to figure out if Wolfe had tried to set him up and wanted to see her telephone records. I explained to Wolfe that I wanted to get all of the messages off her phone, which she agreed to.

10. On September 13, 2017, SA Redies and I conducted a proffer interview with Wolfe. Wolfe said that she sold methamphetamine to Shelledy a few times, specifically one ounce and two ounce quantities for a total of approximately a half pound of methamphetamine. Shelledy had also sold her (Wolfe) a quarter pound a couple of times. Wolfe said Shelledy did not "front" her the methamphetamine, but demanded she pay for it upon delivery. Wolfe specifically remembered purchasing four ounces of methamphetamine from Shelledy in Tightwad, Missouri. Wolfe also purchased morphine pills from Shelledy once a month for about a year, beginning in 2015, obtaining 30 to 60 pills per meeting.

11. Shelledy has been implicated in a separate investigation and indictment that the ATF is handling, and that AUSA Brad Kavanaugh has indicted. As part of the investigation, defendant Randall Holmes proffered pursuant to a *Kastigar* letter. Holmes said that after he started selling methamphetamine in 2015, he was approached by Shelledy. Shelledy requested two pounds of methamphetamine. Holmes later met with Shelledy in a hotel room in Sedalia where he "fronted" Shelledy the 2 pounds of methamphetamine. Holmes believed that Shelledy took the methamphetamine to the Wingman Motorcycle Club in Springfield, Missouri. Shelledy then returned and paid Holmes \$20,000 in cash for the methamphetamine.

12. On October 5, 2017, pursuant to consent given by Wolfe, Cmdr. Matt Wirt (Sedalia PD) performed a forensic analysis of Wolfe's cell phone. I reviewed the contents of the cell phone. I found that the Facebook Messenger information was not captured with the forensic software. I located a Facebook Messenger conversation between "SEDEVILLE JACK," who is known to be Jackie Shelledy, and Wolfe. During the conversation, which spanned over several days between March and April of 2017, it was noted that Shelledy appeared to be questioning Wolfe about

whether she tried to assist law enforcement with an investigation against him. Shelledy requested to see Wolfe's phone records in order to prove her allegiance to him. I believe this is an admission on Shelledy's part that he is involved in criminal activity. It is clear that Shelledy uses Facebook to communicate about his illegal activities.

13. On February 2, 2018, TFO Sprinkles researched Shelledy's Facebook page. Shelledy uses the moniker, SEDVILLE JACK, on Facebook. Photographs of Shelledy are used as cover photographs for this Facebook page. Shelledy frequently makes posts to Facebook showing him wearing a Galloping Goose Motorcycle Club "cut" or leather vest with Galloping Goose insignia and patches. The Galloping Goose Motorcycle Club is known to law enforcement to be a "1%er" Motorcycle Club that takes part in criminal activities such as drug distribution and acts of violence. Shelledy posts about law enforcement operations and investigations that he has been made aware of via Facebook or other sources. Shelledy posts photographs of himself holding large sums of money despite not having a job or being traditionally employed.

14. I believe that records from Facebook will provide evidence, including but not limited to photos, posts, and messenger messages that will corroborate witness statements and clarify surveillance observations. Evidence of the criminal activities by Shelledy will be found within the Facebook account of "SEDVILLE JACK," Facebook ID number 100006833160130.

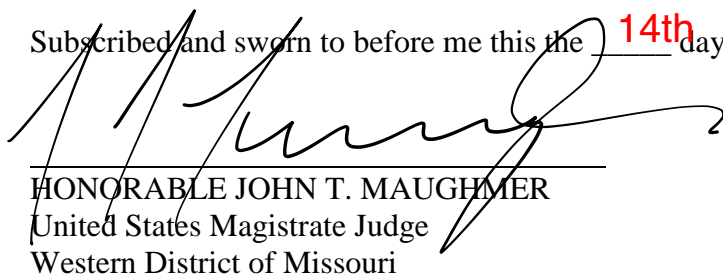
15. On February 6, 2018, TFO Sprinkles submitted a preservation request to Facebook for the account belonging to Jackie Shelledy with the moniker "SEDVILLE JACK" and Facebook ID number 100006833160130. Facebook sent a response stating they have taken reasonable steps to preserve the account requested. Facebook also noted that the preservation will expire 90 days from the acknowledged preservation date. Facebook assigned case number 1478985 to this preservation request.

FURTHER AFFIANT SAITH NAUGHT.



Task Force Officer Joseph R. McCullough
Bureau of Alcohol, Tobacco, Firearms and Explosives

Subscribed and sworn to before me this the 14th day of February, 2018.



HONORABLE JOHN T. MAUGHMER
United States Magistrate Judge
Western District of Missouri